

From: [Casey, Carolyn](#)
To: ["Ronald W. Ruth"](#)
Subject: RE: slag/sediment sampling former USM site, south parcel
Date: Thursday, August 01, 2013 4:17:00 PM
Attachments: [image008.png](#)
[image009.png](#)
[image003.png](#)
[image004.png](#)

I was in the area the other day and the tide was very low so I took a quick look at the area adjacent to the boat club to verify that fencing was installed as indicated on our 5/14 conference call. We do consider the fencing necessary in order to document that human exposures are under control. The fencing, which would prevent direct access and potential exposure is considered sufficient for documentation of the HEC EIs and is in lieu of any actual risk assessment that would evaluate a recreational user exposure.

I was not provided any additional information on the 5/14 call or following the call that would obviate the need to conduct ecological risk assessment. As previously requested, please complete the ecological scoping checklist. Regarding the information that I was told would be provided, is the following from the MCP what was being referred to on the 5/14 call? Our current understanding is that waste material is from the drop forge process, so I am not sure how this is relevant.

40.0006: continued

Audit Follow-up Plan means a plan prepared by an LSP or the Consultant-of-Record pursuant to 310 CMR 40.1100 to confirm, demonstrate or achieve compliance with M.G.L. c. 21E and/or the MCP.

Background means those levels of oil and hazardous material that would exist in the absence of the disposal site of concern which are either:

- (a) ubiquitous and consistently present in the environment at and in the vicinity of the disposal site of concern; and attributable to geologic or ecological conditions, or atmospheric deposition of industrial process or engine emissions;*
- (b) attributable to coal ash or wood ash associated with fill material;*
- (c) releases to groundwater from a public water supply system; or*
- (d) petroleum residues that are incidental to the normal operation of motor vehicles.*

OR

40.0317: Releases and Threats of Release Which Do Not Require Notification

Notwithstanding the provisions of 310 CMR 40.0311 through 40.0315, the following releases and threats of release of oil and/or hazardous material are exempt from the notification requirements set forth in 310 CMR 40.0300:

....

(9) releases of oil and/or hazardous material related to coal, coal ash, or wood ash, excluding wood ash resulting from the combustion of lumber or wood products that have been treated with chemical preservatives;

In addition, the QAPP stated that "In addition, microscopy analyses may be conducted for up to 6 selected "slag" samples in an effort to distinguish between "slag" and products of coal combustion. These analyses will be performed by MicroVision Laboratories of Chelmsford, MA." Was this conducted? If so, please provide the results with interpretation. If not, why?

Carolyn J. Casey

RCRA Facility Manager

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5 Post Office Square, Suite 100

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phone 617-918-1368

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casey.carolyn@epa.gov

From: Ronald W. Ruth [<mailto:RWRuth@sherin.com>]

Sent: Monday, May 13, 2013 4:22 PM

To: Casey, Carolyn

Subject: RE: slag/sediment sampling

Carolyn, we do want our ecological risk assessor to speak with yours prior to preparing a written response as we think it will be more efficient. May suggest that in lieu of the meeting tomorrow we have a conference call, say at 9:15, which includes the risk assessors?

Thank you.

Ron

From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Monday, May 13, 2013 4:01 PM

To: Ronald W. Ruth

Subject: RE: slag/sediment sampling

Our risk assessor has been to the site before and is familiar with the slag, the extent of the material and the erosion or the material into the embayment. The comments that were previously sent, prior to the slag sampling, were based on observations made during that site visit.

I'm sorry but due to resource limitations, we do not believe another site visit by our risk assessor is necessary at this time. Is there something that you think we did not already see or that would convince us to modify our established risk assessment process for this site?

I'd be glad to still meet you there and I can pass along any new information to our risk assessor but perhaps in the interest of everyone's limited time and resources, a written response to the comments would be more appropriate.

Please let me know what you prefer.

Thanks

Carolyn

From: Ronald W. Ruth [<mailto:RWRuth@sherin.com>]

Sent: Monday, May 13, 2013 3:15 PM

To: Casey, Carolyn

Subject: RE: slag/sediment sampling

Carolyn, we are disappointed your risk assessor cannot attend. We frankly think he/she is vital to the meeting as in large part we wanted to have our risk assessor point out the particular aspects of this site to that person. That is the primary Agenda item (will provide an agenda). Is there anyway he/she can attend?

Thanks,

Ron

From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Monday, May 13, 2013 1:17 PM

To: Ronald W. Ruth

Subject: RE: slag/sediment sampling

Agenda, list of people attending? Our ecological risk assessor can't attend. A written response to the comments and a written plan to address the issues would be useful and may be necessary for our ecological risk assessor's review and further input.

Thanks

Carolyn

Carolyn J. Casey

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From: Ronald W. Ruth [<mailto:RWRuth@sherin.com>]

Sent: Thursday, May 09, 2013 5:10 PM

To: Casey, Carolyn

Cc: 'jmorgan@aholdusa.com'; 'jsalvetti@norfolkram.com'; 'Steinberg, Elliot'; 'SClough@haleyaldrich.com'

Subject: RE: slag/sediment sampling

Carolyn, yes. See you there at 9:00.

Thank you for confirming.

Ron

From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Thursday, May 09, 2013 9:09 AM

To: Ronald W. Ruth

Subject: RE: slag/sediment sampling

Are we still on for Tues? Do you have an agenda and list of attendees?

Thanks

Carolyn

From: Casey, Carolyn

Sent: Thursday, April 25, 2013 8:25 AM

To: 'Ronald W. Ruth'

Subject: RE: slag/sediment sampling

Works for me. I'm assuming we will just meet in the parking lot behind McDonalds. Please let me know who will be there.

Thanks

Carolyn

Carolyn J. Casey

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From: Ronald W. Ruth [<mailto:RWRuth@sherin.com>]

Sent: Wednesday, April 24, 2013 10:59 PM

To: Casey, Carolyn

Cc: St. Fleur, Marilyn; 'esteinberg@haleyaldrich.com'

Subject: Re: slag/sediment sampling

Carolyn, does 5/14 Tuesday, 9:00 AM work?

Ron

From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Wednesday, April 24, 2013 04:56 PM

To: Ronald W. Ruth

Cc: St. Fleur, Marilyn <StFleur.Marilyn@epa.gov>; 'Steinberg, Elliot' <ESteinberg@haleyaldrich.com>

Subject: RE: slag/sediment sampling

Anytime Mon, Tues or Wed. Thurs after 2:30 or early morning, would need to wrap up by 10 am.

Thanks

Carolyn

Carolyn J. Casey

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From: Ronald W. Ruth [<mailto:RWRuth@sherin.com>]

Sent: Wednesday, April 24, 2013 4:34 PM

To: Casey, Carolyn

Cc: St. Fleur, Marilyn; 'Steinberg, Elliot'

Subject: RE: slag/sediment sampling

Carolyn, could you possibly give us some dates you could meet at the site the week of May 13. I apologize but we are having scheduling issues on this end.

Thank you.

Ron

From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Monday, April 22, 2013 1:03 PM

To: Ronald W. Ruth; St. Fleur, Marilyn

Subject: RE: slag/sediment sampling

I am working at home today at 978-462-6479 and will be in the office Tues-Thurs. Friday is a planned furlough day.
I could meet at the site this Wed or Thurs morning.
Next week I am available to meet at the site Mon, Wed or Thurs. Tues I am avail for a call except 10-1.

Thanks

Carolyn

Carolyn J. Casey

RCRA Facility Manager

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From: Ronald W. Ruth [<mailto:RWRuth@sherin.com>]

Sent: Friday, April 19, 2013 12:24 PM

To: Casey, Carolyn; St. Fleur, Marilyn

Cc: esteinberg@haleyaldrich.com; 'Joe Salvetti'; Jeff Morgan

Subject: RE: slag/sediment sampling

Carolyn and Marilyn, obviously this has been an odd week.

Could we plan to talk with you next week as to next steps... we believe it would be constructive to meet at the site and talk in context about your questions. We have some thoughts as to how to proceed.

Thank you.

Ron

From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Thursday, March 21, 2013 3:46 PM

To: Ronald W. Ruth; esteinberg@haleyaldrich.com

Cc: St. Fleur, Marilyn

Subject: RE: slag/sediment sampling

Please see the attached draft comments on the Technical Review of the QAPP Data Summary Report Retail Development-South Parcel Former United Shoe Machinery (USM) Facility Beverly, MA dated May 2012.

Please note the comments are marked draft. If necessary, could we plan to discuss this the week of April 15th. I will be out of the office until then.

The second attachment (pdf) is referred to in the comments as attachment 1

Thanks

Carolyn

Carolyn J. Casey

RCRA Facility Manager

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From: Ronald W. Ruth [<mailto:RWRuth@sherin.com>]

Sent: Wednesday, March 06, 2013 3:55 PM

To: Casey, Carolyn; esteinberg@haleyaldrich.com

Cc: St. Fleur, Marilyn

Subject: RE: slag/sediment sampling

Carolyn, we did not receive your original email. Thank you for resending.

Let me look into this and get back to you.

Ron

From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Wednesday, March 06, 2013 3:39 PM

To: Ronald W. Ruth; esteinberg@haleyaldrich.com

Cc: St. Fleur, Marilyn

Subject: FW: slag/sediment sampling

I have not had a response on the message below so I am sending again and hopefully to the right person this time.

FYI, I am filling in for Marilyn while she is on a detail until the end of the year or so.

Thanks

Carolyn

Carolyn J. Casey

RCRA Facility Manager

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casey.carolyn@epa.gov

From: Casey, Carolyn

Sent: Thursday, January 24, 2013 2:57 PM

To: aeajemian@sherin.com; esteinberg@haleyaldrich.com

Cc: St. Fleur, Marilyn

Subject: slag/sediment sampling

Are the results for the slag/soil sampling along the Bass River in Beverly reportable concentration under the MCP and if so, has a report been prepared and submitted to the DEP?

Thanks

Carolyn

Carolyn J. Casey

RCRA Facility Manager

United States Environmental Protection Agency

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may be a computer program.
This
attached computer program

could
contain a computer virus
which could cause harm to

EPA's computers,

network, and data.
The

attachment has been

deleted.

This was done to
limit
the distribution of computer
viruses

introduced
into the EPA

network. EPA is deleting

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legitimate,
you
should
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sender and request that they rename the file

name
extension and resend the
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After
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attachment, you
can
rename the

file extension to
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